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TRW**MARLIN-ROCKWELL DIVISION**

April 14, 1977

Mr. Stanley J. Pac, Commissioner
State of Connecticut
Department of Environmental
Protection
State Office Building
Hartford, Connecticut 06115

Re: Marlin-Rockwell Division of TRW Inc.
Abatement Order 2082

Dear Mr. Pac:

In accordance with Section 25-540 of Chapter 474a of the Connecticut General Statutes, As Amended, and the regulations relating to such statutes, I am submitting on behalf of the Marlin-Rockwell Division of TRW Inc. ("MRC"), in letter form, an administrative answer to Abatement Order No. 2082 (the "Abatement Order") and I am requesting a hearing or informal conference with the State of Connecticut Department of Environmental Protection ("DEP") to clarify the terms and conditions of the Abatement Order in light of additional information relevant to this matter.

As you are probably already aware, MRC and the DEP have been working very closely to avoid a pollution problem arising from the lagoon on MRC's property in Plainville, Connecticut. In that regard, MRC has invested considerable time and energy investigating this matter and has contracted with DeLew, Cather & Company ("DCO"), a major engineering organization, to obtain assistance in devising a plan to treat and dispose of such waste materials. MRC also has had a continuing dialogue with Mr. James Grier, Sanitary Engineer, Water Compliance Unit, who has been quite helpful in assisting MRC in solving the problem.

On January 31, 1977, MRC presented Mr. Grier with an interim report (the "interim report") (see Attachment 1) which outlined a tentative solution to the waste disposal problem. However, the interim report covered only one tentative solution to the problem, i.e. the combustion of the waste materials contained in the lagoon. After having had an opportunity to review the interim report, Mr. Grier, in a February 18, 1977 letter to Mr. Sebastian (see Attachment 2), Chief Mechanical Engineer of DCO, expressed some concerns regarding the particular method outlined in the interim report. Mr. Grier suggested that alternative methods of treatment and disposal be developed concurrently in the

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event testing results prove combustion unacceptable, Mr. Grier further underscored this concern at a meeting on February 24, 1977, with MRC personnel and DCO representatives, Mr. Sebastian and Mr. Robert Prochaska. Based upon these concerns and MRC's desire to devise the best possible method to solve the problem, MRC instructed DCO to broaden the scope of its report and to explore other possible alternatives while at the same time to continue its efforts to implement the plan proposed in the interim report.

The thrust of this answer pertains to MRC's concerns regarding the time-tables established in the Abatement Order, in particular, item a which states that "on or before April 30, 1977, [MRC must] submit for the review and approval of the Commissioner of Environmental Protection a final engineering report on the method of treatment and disposal proposed." These concerns are of pressing importance to MRC because during the February 24, 1977, meeting, DCO commented that it would be very difficult to prepare a final report by April 30, 1977, because the lagoon was at that time still frozen and considerable laboratory work will be required to establish a final recommendation. MRC has been informed by DCO that a final report (the "final report") outlining all of the possible alternatives would not be available until May 31, 1977, one month after the initial April 30, 1977, deadline of the Abatement Order. Both MRC and DCO are concerned about MRC's apparent inability to meet the initial April 30, 1977, deadline as well as MRC's inability to forecast its capability to meet other deadlines enumerated in the Abatement Order due to the fact that MRC has not had an opportunity to evaluate the results of the final report. As evidenced by a statement in Mr. Grier's letter to Mr. Sebastian, the Abatement Order was issued with an implementation schedule consistent with the dates suggested in the interim report. As a result, MRC feels that it is advisable at this time to seek clarification of the Abatement Order by requesting an alternative timetable that will be consistent with the results of the final report.

Although MRC understands and fully appreciates the DEP's desire to give it flexibility as stated in the Abatement Order to the effect that "Marlin-Rockwell Division of TRW Inc. is further ordered to accomplish the above-described program, except as may be revised by the recommendations of a detailed engineering study and agreed to by the Commission of Environmental Protection," MRC will not have a "detailed engineering study" to rely on for requesting revisions of the Abatement Order until one month beyond the initial April 30, 1977, deadline.

MRC is not attempting to drag its feet as evidenced by efforts to implement the proposal formulated in the interim report. However, MRC is concerned about potential sanctions that could be levied against it for failing to meet the April 30, 1977, deadline and about its inability at this time to submit a revised engineering study to substantiate its request for revisions of the Abatement Order.

As a consequence of all of the factors enumerated above, I am requesting a hearing on this matter or, in the alternative, if this matter can be successfully handled on an informal basis, I am requesting an informal meeting with appropriate DEP personnel to discuss revising the Abatement Order along guidelines to be established in accordance with the final report.

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Hopefully, the results of any meeting MRC might have with DEP personnel will allay MRC's concerns regarding its position with the DEP and will assure the DEP of MRC's intentions to successfully complete the project as soon as possible.

Very truly yours,

Ronald Putnam

Ronald Putnam
Manufacturing Engineering
Manager

RP:aa

cc: J. Grier
P. Kremlick
R. Prochaska

Attach.

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